

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

MARC VEASEY, *et al.*,

Plaintiffs,

VS.

RICK PERRY, *et al.*,

Defendants.

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§

CIVIL ACTION NO. 2:13-CV-00193

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, ET AL,)
) CIVIL ACTION
)
Plaintiffs,) NO. 2:13-CV-00193
)
V.)
)
RICK PERRY, ET AL,)
)
Defendants.)

ORAL DEPOSITION OF

MATTHEW A. BARRETO, Ph.D.

AUGUST 26, 2014

ORAL DEPOSITION OF MATTHEW A. BARRETO, Ph.D.,
produced as a witness at the instance of the
DEFENDANTS, and duly sworn, was taken in the
above-styled and numbered cause on the 26th of August,
2014, from 9:05 a.m. to 10:58 a.m., before Tamara
Vinson, CSR in and for the State of Texas, reported by
machine shorthand, at Matthiesen & Associates, 511
Lovett Boulevard, Houston, Texas, 77006, pursuant to
the Federal Rules of Civil Procedure and the
provisions stated on the record or attached hereto.

1 A. I think that's what it called now.

2 **Q. I think so. You have been at the University**
3 **of Washington in Seattle?**

4 A. Correct, I'm currently professor of political
5 science at the University of Washington in Seattle
6 where I've been since 2005.

7 **Q. And was that your first stop as a professor?**

8 A. Yes, that was my first tenured track academic
9 appointment.

10 **Q. And you were tenured at the University of**
11 **Washington?**

12 A. Correct.

13 **Q. And how long have you been tenured there?**

14 A. I received tenure in maybe 2009 and was just
15 promoted to full this year.

16 **Q. You sat through the entire deposition of**
17 **Dr. Sanchez yesterday?**

18 A. Correct.

19 **Q. You were working on your laptop on something**
20 **else, I'm assuming?**

21 A. For most of the time, yeah. I think I took a
22 few notes of interesting questions you had brought up.

23 **Q. What notes did you make that were interesting**
24 **to you?**

25 A. I don't recall right now, but, in particular,

1 come and convince them that this tastes really good
2 and it's healthy, and if they don't have an ID, they
3 will never be able to eat those.

4 **Q. You would agree that is for the individual to**
5 **decide, though. Correct?**

6 A. The individual -- my perspective is that the
7 individual should have the same right to eat the live
8 tarantula as somebody who has a driver's license.

9 **Q. Okay.**

10 MR. DUNN: I'm ready for a bathroom
11 break when it's an okay time.

12 MR. SCOTT: What? Okay.

13 THE WITNESS: Just getting warmed up.

14 MR. SCOTT: Hey, we're having fun. Come
15 on, Chad. We want to get out of here before 5:00.
16 I've got a 5:30 flight.

17 (Break.)

18 MR. SCOTT: Back on the record.

19 **Q. (By Mr. Scott) Dr. Barreto, were you able,**
20 **through the test questions, to confirm in the survey**
21 **the type of IDs that were presented by voters at Texas**
22 **elections in the past?**

23 A. We did not. We only asked questions about
24 what they currently possess.

25 **Q. Okay. Did any of those questions ask about**